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June 17, 2025

**BY ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Kevin Gao, 25 CR 53 (PAE)**

Dear Judge Engelmayer:

I am writing on behalf of defendant Kevin Gao to respectfully request a modification of the defendant's conditions of pretrial release which would permit him to travel to Albany, New York from June 29-30, 2025 and July 3-4, 2025 in order to drop off and pick up his children from summer camp. The government, by AUSA Christopher Brumwell, and Pretrial Services, by USPSO Taelor Nisbeth, both have no objection to this application. If approved, Mr. Gao would provide Pretrial Services with a detailed itinerary of his trip.

By way of background, on February 13, 2025, Mr. Gao was released on a \$150,000 personal recognizance bond by Judge Aaron, co-signed by two financially responsible persons, and with conditions, *inter alia*, limiting his travel to the Southern and Eastern Districts of New York, and the District of New Jersey. Since that time, Mr. Gao has remained compliant with his conditions of release.

Thank you for the Court's consideration of this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

  
Jeffrey Einhorn

**GRANTED.** The Clerk of Court is requested to terminate the motion at Dkt. No. 15.

6/20/2025

cc: All counsel (by ECF)  
USPO Taelor Nisbeth (by email)

SO ORDERED.

  
PAUL A. ENGELMAYER  
United States District Judge